

NPRM 02-230 asserts that the current analog broadcast transmissions are somehow immune to re-distribution on the Internet. This is patently false given the wide availability of analog TV tuner/digitization cards. These cards can be purchased for as little as \$50 and hundreds of thousands of such cards have been purchased over the past several years. These cards permit both viewing live telecasts in a window on a PC monitor, as well as digitization and storage of the video signal on the PC hard drive (permitting potential redistribution on the Internet).

NPRM 02-230 implies that redistribution of the HDTV content on the Internet is somehow trivial or straightforward simply because of the digital format of HDTV. This is factually false. First, as in the analog case above, a tuner would be required to capture the signals. Further, because of the immense data requirements of the native HDTV data format, the stored data would need to be converted into a lower-quality format for any redistribution on the Internet. Note that the resultant quality would be little different than that achieved by digitizing current analog broadcasts.

NPRM 02-230 seems to lack a greater understanding of the Internet and how it works. It implies it is somehow like broadcast airwaves and that one can "magically" connect an HDTV broadcast to the Internet for redistribution. Note that a typical home broadband Internet user has only 128-256Kbit/sec of upstream bandwidth. This effectively makes impossible for such a user to stream a HDTV broadcast in realtime. Even a user with a high bandwidth upstream link (such as a college dormitory user) would have trouble sourcing more than 1 or 2 HDTV streams in realtime. As stated above, the Internet is not a broadcast network and the data for each receiver must be replicated on the Internet.

In short, the HDTV fears have been vastly overstated and ignore the technical realities involved (requirements of a tuner card, re-encoding of signals, disk storage requirements, and Internet bandwidth limitations). Further, HDTV does not introduce any vulnerabilities not already present in current over-the-air analog broadcasts due to the ready availability of tuner/digitizer cards for analog signals.